

PRM

DEC 20 1973

FCC - MAIL

Dear Sir:

Thank you.

New Orleans

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PRM

Before the

## FEDERAL COMMUNICATIONS COMMISSION

DEC 20 1983

In the matter of

Establishing clarity  
in the name of the  
existing General  
Radiotelephone Operator  
license

FCC - MAIL ROOM

Petition for Rule Making

1. In 1980, the Federal Communications Commission in Docket 20817 proposed elimination of the existing commercial radio operator license structure as a result of its no longer requiring such a license for commercial broadcast stations. The docket was adopted and Commission Rules and Regulations were amended to reflect this change.

2. Immediately following the Commission's elimination of the First and Second Class Radiotelephone licenses, a new class of radiotelephone operator license known as "General Radiotelephone Operator License" was established to serve those services still requiring operator licensing. The Commission's operator examination requirements were similar to those previously used for the old First and Second Class operator licenses, however applicants who successfully completed the examination would be granted the new "General Radiotelephone Operator License". Those holders of the old First or Second Class licenses were "grandfathered" into the new licensing structure and issued the new "General Radiotelephone Operator License" when their existing First or Second Class licenses reached their normal renewal cycle.

3. Following these changes in FCC licensing of radio operators numerous private agencies attempted initiation of their own testing and granting of certificates. Although a small degree of success in these private examination efforts resulted it paled in comparison to the FCC's licensing structure in stature, uniformity and acceptance.

4. Although Commission regulations still do not require an operator license at broadcast stations, a renewed interest and growth is being experienced in those technical fields still requiring an FCC license.

5. In addition to the Commission's issuance of the "General Radiotelephone Operator License" to commercial radio operators, it also issues a radio license known as the "General Class license" to amateur radio operators (FCC Part 97). The resultant confusion between these two licenses is obvious.

(5. Continued)

Although the two radio operator licenses are very similar in name, each grants totally distinctive privileges in completely different communications services.

6. In view of the above reasons, I respectfully petition the Federal Communications Commission to amend its Rules and Regulations (Part 13 and elsewhere where applicable) to rename the "General Radiotelephone Operator License," "Commercial Radiotelephone Operator License." The license should be named what it actually is and this change would establish clarity.

In addition, I should like to suggest the Commission return to text format and appearance for this proposed "Commercial Radiotelephone License" as was in place on its original Form 758 license certificate. The existing text format and appearance used on the current "General Radiotelephone Operator License" is ambiguous, poorly written and does not compare favorably to similar commercial license certificates issued by other WARC countries or the original engraving used on Form 758.

Lastly I request this petition be made available for public comment.

Respectfully submitted,



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13 December 1993